

T.C., by and through undersigned counsel, hereby respectfully replies to the Government's response to his letter concerning securing his appearance with foreign property, Dkt. 38.

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sufficient to assure the appearance of 16-year-old T.C. and would expedite his release, but the Turkish property is available to secure a larger bond if this Court deems it necessary. It should be noted that even if there are difficulties in forfeiting foreign real estate, given the close working relationship of the Turkish and U.S. governments, it is the reasonable belief of T.C.'s father that any failure of his son to conform to the condition of release that his home will be subject to forfeiture.

A lesser cash bond secured the release of the defendant in *Pennings* and *Knox* (who was not required to post any cash) – two defendants who were charged with fraudulently obtaining millions of dollars – in contrast to a juvenile who independently has no resources, whose offense was not one alleged to be committed with criminal intent, and who is presently housed in an utterly inappropriate location, which is essentially a maximum security adult prison run by the CT Department of Corrections, that has failed, *e.g.* to keep his identity and his “mug shot” confidential, to facilitate calls with his family, to house him apart from older inmates or inmates who have been convicted or are facing charges of violent U.S. offenses. *See* Dkt. 26, 27, and 40. Moreover, the terms of bail that resulted in the release of Pennings did not result from his cooperation with the Government. Indeed, Pennings was released in August of 2016, *United States v. Pennings*, Dkt. 16-cr-10094-LTS, Dkt. 53 (D. Mass), at a time he was challenging the charges pending against him, *see id.* at Dkt. 142 (May 2017 motion to dismiss), rather than cooperating – a decision that came long after foreign property was accepted as part of his conditions of release. *Compare id.* at Dkt. 162.

Finally, the monetary conditions proposed by T.C. are not the only conditions of release designed to mitigate concerns of flight. *See* Dkt. 22 at 7. T.C., if released, will stay with his relatives in Massachusetts under their supervision and care and will be subject to whatever

conditions this Honorable Court believes are appropriate including a curfew or even house arrest (although counsel would urge the court to allow the juvenile to work or go to school), surrender of any travel documents which are currently in the possession of his counsel, and any other condition that the Court believed would, in the aggregate, assure his appearance. Surely, these conditions (in addition to any other conditions the Government proposes or this Honorable Court orders) would be sufficient to ensure the appearance of a sixteen-year-old, who has never before been arrested or charged with a crime, who will have no travel documents, who will be with a functional guardian ad litem who will be responsible to the Court, who can be trusted not to destroy his life by making the same mistake twice, who was not the decision-maker in terms of his response to the accident that is the subject of the extradition request, and who as of today has already spent 12 days in a facility that is paradigmatically ill-suited to detain a presumed innocent juvenile.

Respectfully Submitted,

T.C.,
By His Attorney,

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CERTIFICATE OF SERVICE

I, Martin G. Wienberg, hereby certify that on this date, June 26, 2024, a copy of the foregoing documents has been served via Electronic Court Filing system on all registered participants.

/s/ Martin G Weinberg
Martin G Weinberg, Esq.